

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT V-02-033 R1

Griffin Industries, Inc.-Butler facility

4221 Alexandria Pike

Cold Spring, KY 41076

April 18, 2007

Lisa Beckham, Reviewer

SOURCE ID: 021-191-00007

AGENCY INTEREST #: 3408

ACTIVITY ID: APE20060001

SOURCE DESCRIPTION:

An operating permit application was received from Griffin Industries-Butler facility on December 11, 2006 and was complete on February 07, 2007. The applicant proposes to cap emissions of hydrogen chloride, use recycled cooking oil as a fuel source for two of the facility's boilers and remove the cooling tower as an emission unit to the insignificant activities list. Also Griffin submitted an economic analysis for the installation of a regenerative thermal oxidizer (RTO) unit to control VOC emissions from its bakery scrap process.

PUBLIC AND U.S. EPA REVIEW:

On March 13, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Falmouth Outlook* in Falmouth, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Griffin Industries, Inc. on April 11, 2007. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received; however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

ATTACHMENT A

Response to Comments

Comments on Griffin Industries-Butler facility Draft Title V Air Quality Permit submitted by F. Michael Schmidt, C.H.M.M, Corporate Environmental Coordinator.

Permit Application Summary Form

1. The first sentence in the third paragraph under “**CURRENT PERMITTING ACTION**” should be modified to read: “In the initial Title V application ~~Griffin~~ the Division assumed the injection of ammonia to the cooling tower, and Griffin was granted....”. This was a misunderstanding on the part of the Division that goes back to the old permit before the Title V permit was issued.

2. The next sentence should be modified to read: “The reason is that ammonia is not injected or processed at the facility, and is only ~~used as a cleaner~~ present as a metabolic byproduct of the raw materials (which results in the trace quantities detected in the water....”. This is a more accurate description of the source of ammonia.

Division’s Response: The Division acknowledges that these sentences should be reworded for clarity. The first three sentences have been changed to read: “When the cooling tower was installed in 1987 Griffin submitted information regarding the emission of ammonia from the cooling tower and was granted the usage based on dispersion modeling analysis by the Division and the state’s rescinded toxics Regulation 401 KAR 63:022. The Division has evaluated recent submittal by the facility that ammonia is not emitted at the facility and concurs that the cooling tower should be classified as insignificant. The reason is that ammonia is not injected or processed at the facility, and is only present as a metabolic byproduct of the raw materials (which results in the trace quantities detected in the water from the cooling tower, which can be stripped or emitted to the air).”

3. Griffin objects to the Division’s statement in the last paragraph of this section: “Because of the variation in the product Griffin receives, 113 tons per year does not likely represent their maximum potential, which is believed to be over 250 tons per year...” Griffin does not understand the Division’s basis for this statement.

Division’s Response: The dough used in the Bakery Scrap process has varying levels of yeast, which makes it impossible to determine one emission factor for VOC (ethanol) from the process. The 113 tons per year of VOC emissions submitted by Griffin was based on actual emissions being scaled up. Since the facility is currently limited to 90 tons per year of VOC emissions this scaled up number is based on restricted operating conditions. If large amounts of dough with very high ethanol content were received it is possible for annual emissions to exceed 250 tons per year. The Division believes that Griffin does not want to restrict the amount or type of dough it can receive; however, the Division must still be able to ensure that emission thresholds are not being exceeded and that the permit is enforceable.

Permit Statement of Basis

4. Language noted above in the **PERMIT APPLICATION SUMMARY FORM** is repeated here in the **PERMIT STATEMENT OF BASIS**, and Griffin requests the same revisions.

Division's Response: See responses to comments 1 through 3. The same changes have been made.

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Emission Unit 01 and 02 – Indirect Heat Exchangers. (Page 3 of 27)

5. Griffin requests that permit condition 2.d. be moved and renumbered to permit condition 1.g. as the on-spec used oil specifications are more of an operating limitation than an emission limitation. Griffin also requests that the limit for Total halogens in the specifications table be changed from 900 ppm maximum to 800 ppm maximum.

Division's Response: The Division does not concur with the request to move the on-spec used oil from an emission limitation to an operating limitation because the allowable levels of the used oil are set so that the concentration levels are met at any given time. The total halogens limit has been corrected from 900 to 800 ppm.

6. Griffin objects to the permit condition 4.a. increase in frequency of the qualitative visible emissions observations from once a week in the current permit to once a day in this draft. As there has only been once instance of a visible emissions problem from these boilers, Griffin does not believe that a five or six fold increase in VE observations is warranted. Griffin requests that this requirement remain unchanged from the current permit.

Division's Response: The Division concurs, change made.

Emission Unit 03 – Rendering Process. (Page 6 of 27)

7. Griffin objects to the permit condition 4.a. increase in frequency of the qualitative visible emissions observations from once a week in the current permit to once a day in this draft. As there has never been a single instance of a visible emissions problem from this process, Griffin does not believe that a five or six fold increase in VE observations is warranted. Griffin requests that this requirement remain unchanged from the current permit.

Division's Response: The Division concurs, change made.

Emission Unit 04 – Indirect Heat Exchanger. (Page 9 of 27)

8. Griffin objects to the permit condition 4.a. increase in frequency of the qualitative visible emissions observations from once a week in the current permit to once a day in this draft. As there has only been once instance of a visible emissions problem with this boiler, Griffin does not believe that a five or six fold increase in VE observations is warranted. Griffin requests that this requirement remain unchanged from the current permit.

Division's Response: The Division concurs, change made.

Emission Unit 07 – Close-coupled Gasification Unit and Product Dryer. (Page 12/13 of 27)

9. Permit condition 2.b of the current permit has been omitted. This condition states: “Pursuant to Regulation 401 KAR 59:010, particulate matter emission from the process shall not exceed $[3.59(P)^{0.62}]$ pounds per hour based on a three hour average where P is the hourly operating rate in tons per hour.” Griffin believes that this condition should remain in the permit as it establishes the allowable particulate emission limit from the process (CCG burner and dryer). Without this condition it would appear that the only particulate limit for this source would be found in 2.a of the draft permit “0.23 g/dscm corrected to twelve percent carbon dioxide”. Griffin requests that this previous condition be returned to the permit.

Division’s Response: This condition was removed because 401 KAR 59:010 is only applicable when no other particulate standard applies. Since 401 KAR 59:020 applies to this process, and is more stringent than 401 KAR 59:010, it is the only applicable regulation. It was included in the previous permit by mistake. The unit is still considered to be in compliance with the 0.23 g/dscm limit based on the 2004 performance test for particulates. Also, 401 KAR 59:010 was still listed as an applicable requirement for this unit in the Statement of Basis, but has been removed.

10. Griffin objects to the permit condition 4.a. increase in frequency of the qualitative visible emissions observations from once a week in the current permit to once a day in this draft. Griffin does not believe that a five or six fold increase in VE observations is warranted. Griffin requests that this requirement remain unchanged from the current permit.

Division’s Response: The Division concurs, change made.

11. Permit condition 5.b. requires Griffin to maintain records regarding the maintenance of all scrubbers. There are no scrubbers on this emission source. Griffin requests that this requirement be deleted from the permit.

Division’s Response: The condition should have read: “Pursuant to 401 KAR 52:020, Section 26, records regarding the maintenance of the cyclone shall be maintained.” Change made.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.